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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

AARON MICHAEL SHAMO,

Defendant.

Case No. 2:16-cr-00631-DAK

UNITED STATES' RESPONSE
REGARDING ITS BRADY/GIGLIO
OBLIGATIONS

Judge Dale A. Kimball

The United States, by and through Michael Gadd, Special Assistant United States Attorney, certifies that it has satisfied its *Brady/Giglio* disclosure obligations. The undersigned prosecutor met and conferred with counsel for the defendant today and answered their questions, specifically questions regarding whether any additional co-conspirators had been charged for their involvement with Mr. Shamo's drug trafficking enterprise.

While conferring today, the defendant's representatives indicated they were aware of Mr. Shamo's co-conspirators who had been charged but inquired about additional suspects whose names appear on the defendant's witness list. The United States assured

them that it had not charged any of the defendant's proposed witnesses other than those previously identified. The United States recognizes that its disclosure obligations remain ongoing.

Respectfully submitted this 8th day of August, 2019,

JOHN W. HUBER
United States Attorney

/s/ Michael Gadd
MICHAEL GADD
Special Assistant United States Attorney